

**REMARKS**

Claims 54-89 are all the claims pending in the application.

Claims 54, 63, 67, 70, 71, 72 and 85 are amended.

Claims 54-89 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Evain in view of Kirk. Each of the independent claims, namely claims 54, 63, 67, 70, 71, 72 and 85, is amended to indicate that the predetermined standard code corresponds to a frequently used fragment type. Support for this amendment is found at least in paragraph [103] of the specification. Applicant respectfully submits that the asserted Evain/Kirk combination does not render the claims unpatentable.

Neither Evain nor Kirk discloses that the location information for a fragment is expressed as a predetermined code in which the predetermined code corresponds to a frequently used fragment type, as recited in claim 54, for example. Evain does not disclose using predetermined codes to express location information for a fragment. Kirk is cited for teaching an enumerated storage system that substitutes codes for values in a database. However, Kirk does not teach that those substitute values correspond to frequently used values. Rather, Kirk merely discloses using enumerated storage when a value is stored in a database multiple times, irrespective of whether those values are frequently used. See Kirk, col. 2, lines 20-30. Kirk teaches recording the values in a lookup table and storing in the database, in place of the value, the appropriate offset into the lookup table. However, Kirk does not teach or suggest storing a code in a look-up table when the value is a frequently used value. Rather, Kirk merely discloses storing codes in the look-up table for values that occur multiple times in the database. *Id.* Accordingly, it is

AMENDMENT UNDER 37 C.F.R. § 1.114(c)  
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respectfully submitted that even if the teachings of Evain were modified to use the enumerated storage techniques taught by Kirk, the combination would not satisfy all the limitations of the claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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